

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

J. Keith Radecic,
Plaintiff

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v.

* Docket No.: 1:20-CV-00495-AJ

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Southern New Hampshire
Radiology Consultants, P.C.,
Defendant

JOINT MOTION TO AMEND THE DISCOVERY PLAN

Pursuant to Fed. R. Civ. P. 6(b)(1) and 7(b), the parties hereby move this Honorable Court to modify its Scheduling Order, dated July 17, 2020, Document 8. Specifically, the parties request that the Court modify the discovery schedule as follows:

1. Expert Disclosures and Reports, New Deadline: Plaintiff, June 1, 2021;

Defendant, August 1, 2021.

2. Completion of Discovery, New Deadline: November 15, 2021.

3. Motions for Summary Judgement, New Deadline December 15, 2021.

The parties state that there have been delays in procuring medical records and other documents with the result that no depositions have taken place as of yet.

Wherefore, for the foregoing reasons, the parties request that the foregoing deadlines be substituted for those set forth in the Court's Scheduling Order, dated July 17, 2020, Document 8.

Respectfully submitted,

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